

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK**

CONSUMER FINANCIAL
PROTECTION BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC
FINANCIAL SOLUTIONS, LLC), et
al.,

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

**Declaration of Terrence M.
Connors, Esq.**

Case No. 24-CV-40-EAW-MJR

Terrence M. Connors, Esq., declares under penalty of perjury under the laws of the United States pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am an attorney at law admitted to practice my profession in the State of New York and the United States District Court for the Western District of New York and a partner in Connors LLP, counsel for Intervenor Clear Creek Legal, LLC, Credit Advocates Law Firm, LLC, Greenstone Legal Group, Brandon Ellis Law Firm LLC, Hailstone Legal Group, Hallock and Associates, Harbor Legal Group, Anchor Law Firm, PLLC, Bedrock Legal Group, Boulder Legal Group, Canyon Legal Group, LLC, Great Lakes Law Firm, Heartland Legal Group, Level One Law, Meadowbrook Legal Group, Monarch Legal Group, Newport Legal Group, LLC, Northstar Legal Group, Option 1 Legal, Pioneer Law Firm P.C., Rockwell

Legal Group, Spring Legal Group, Royal Legal Group, Slate Legal Group, Stonepoint Legal Group, The Law Firm of Derek Williams, LLC, Whitestone Legal Group, Wyolaw, LLC, Chinn Legal Group, LLC, Leigh Legal Group, PLLC, Hallock & Associates LLC, Gustafson Consumer Law Group, LLC, Michel Law, LLC, The Law Office of Melissa Michel LLC, and Moore Legal Group, LLC (collectively, “Law Firms”).

2. I submit this declaration in support of the Law Firms’ motion for an Order of this Court modifying the Preliminary Injunction (Dkt. 184) to allow the processing and timely payment of a claim submitted by the Law Firms against a captive insurance policy at Cell Gramercy 2 of Contego Insurance, Inc., and to allow the processing and payment of future claims of the policy’s limit.

3. Attached hereto as **Exhibit 1** is a March 15, 2024 email providing Notice of a Loss Event, Insurance Schedule, and Corporate Legal Expenses.

4. Attached hereto as **Exhibit 2** is a March 16, 2024 email to the Receiver and a March 20, 2024 response.

5. Attached hereto as **Exhibit 3** is an exemplar Whitestone Legal Group Service Agreement.

6. Attached hereto as **Exhibit 4** is a copy of the Cell Gramercy 2 of Contego Insurance, Inc., insurance policy.

WHEREFORE, for all the reasons stated in the accompanying memorandum of law, the undersigned respectfully requests an Order of this Court modifying the

Preliminary Injunction (Dkt. 184) to allow the processing and timely payment of a claim submitted by the Law Firms against a captive insurance policy at Cell Gramercy 2 of Contego Insurance, Inc., and to allow the processing and payment of future claims up to the policy's limit, together with such other and further relief as this Court deems just and proper.

Dated: Buffalo, New York
March 22, 2024

/s/ Terrence M. Connors
Terrence M. Connors